everyoneon

November 3, 2016

Federal Communications Commission, Wireline Competition Bureau
CC Docket No. 02-06; WC Docket No. 10-90, WC Docket No. 13-184

Public Notice and Request for Comments: Off-Campus Use of Existing E-Rate Supported Connectivity

EveryoneOn respectfully submits these comments in response to the Wireline Competition Bureau's Public Notice seeking comments on petitions regarding Off-Campus Use of Existing E-Rate Supported Connectivity.

Introduction

EveryoneOn supports the expansion of off-campus, at-home connectivity for students. In service of this broader goal, EveryoneOn calls for 1) the extension of existing E-rate supported connectivity off-campus without requiring cost allocation and 2) permissible utilization of TV White Space to broadcast Wi-Fi to residents of the surrounding area.

To achieve greater at-home connectivity for students through expanded E-rate and TV White Space service, EveryoneOn advocates for:

- **General broadening of current E-rate service eligibility**
    - Existing E-rate service for in-school connectivity should be utilized beyond the school day – extending E-rate service to surrounding public housing is a critical opportunity to rectify underutilization and to maximize the educational impact of this broadband.
    - EveryoneOn is often contacted by schools who have E-rate dollars left over for either Category One or Category Two use, but no permissible items to spend them on. This money should be opened up, both in general and specifically for at-home connectivity for students. We applaud the petitioners' plans to stretch current resources and capacity to new places and expand availability without hindering original goals of in-school connectivity and broadband for educational use.
- **Relaxing current E-rate constraints on TV White Space (TVWS) use**
    - Allowing TVWS under the E-rate program to be used to broadcast Super Wi-Fi and bring high-speed Internet connection to areas currently without furthers the educational mission of the E-rate program. We support the removal of the regulatory barriers prohibiting the utilization of this technology in order to bring Wi-Fi to students' homes.
- **Codify by rule these expansions to facilitate students' at-home connectivity**

- The Federal Communications Commission (FCC) should pass a rule in the absence of other legislation, expanding the use of E-rate funds for off-campus use and the utilization of schools' TV White Space under E-rate as Wi-Fi for surrounding areas.

Expanding E-rate supported connectivity to the surrounding community:

1) helps close the Homework Gap,
2) furthers the educational mission of the E-rate program, and
3) furthers interested parties' goal of closing the digital divide, with schools as key anchor institutions in providing broadband.

Expanding E-rate to Off-Campus Use: Risks and Mitigation

The benefits of at-home connectivity on educational outcomes are clear. The following are two common objections to using E-rate support to achieve at-home connectivity, as well as counterarguments.

Original Program Goal of In-School Connectivity

We're accomplishing the original goal of the E-rate program: full in-school connectivity. We must now define the next goal for technology, educational attainment, and the digital divide: increasing at-home connectivity.

The original goal of the E-rate program as a function of the Universal Service Fund was to provide in-school connectivity. The past few years have witnessed great strides in at-school connectivity, with 77 percent of school districts providing high-speed connectivity in school in 2015.[1] President Obama's ConnectED initiative plans to connect 99 percent of students in their schools by 2018.[2] E-rate service has proven to be a successful model for increasing in-school connectivity. As we grow ever closer to attaining the original goal of the E-rate program, we must begin to think of how to further the underlying mission of the program, namely connecting students to the Internet for educational purposes and closing the digital divide in schools. In expanding E-rate to support at-home service, E-rate will still further in-school connectivity. However, the program would then be able to work to close the digital divide for students in its current form, the Homework Gap.

Change in Financial Investment in In-School Connectivity

E-rate expansion will not prohibit nor discourage schools from continuing to invest E-rate dollars in in-school connectivity.

---

[1] "State of the States Report, 2015: A report on the state of broadband connectivity in America's public schools," *Education SuperHighway*, November 2015. http://stateofthestates.educationsuperhighway.org/assets/sos/full_report-55ba0a64dcae0611b15ba9960429d323e2eadbac5a67a0b369bedbb8cf15ddbb.pdf. 77 percent of districts provide 100 kbps of in-school connectivity per student.

[2] "Education for K-12 Students: ConnectED," *The White House*. https://www.whitehouse.gov/issues/education/k-12/connected

Petitioners have stated that no additional funding will be needed from the Universal Service Fund to expand E-rate supported connectivity off-campus. The Charlotte and Halifax County petition demonstrates that no additional costs will be incurred, and the Boulder Valley petitioners plan to fund any additional costs to providing E-rate supported connectivity off-campus using external funds. Thus, existing E-rate funding will not be taken away from in-school connectivity in order to provide off-campus service. Though E-rate funding is not needed for the two petitions presented here, schools have expressed a desire for more numerous and broader use cases for designated E-rate funding. Schools have unused Category Two funding, but cannot spend it because remaining use cases are not permissible.[3] EveryoneOn has observed a number of schools seeking to apply E-rate funding to the White House's ConnectED program to close the Homework Gap for their students, but failing to receive approval, despite having the funds available. As schools near full in-school connectivity, they want to use E-rate funding to support broadband for educational use by extending service to students at-home.

Rationale for Off-Campus Use

Reducing the Homework Gap

Expanding E-rate supported connectivity to the surrounding community would help close the Homework Gap, a primary contributor to the Achievement Gap in educational attainment.

As schools increasingly have Internet access in the classroom, curricula are shifting towards greater inclusion of digital resources both in the classroom, where students share equal access to the Internet, and in homework assignments. When the final bell rings, some students head back to a connected home, able to complete their homework and take advantage of digital educational resources that help them excel and achieve in school. Others are unconnected at home – 31.4 percent of households with school-aged children making under $50,000 a year, in fact.[4] These unconnected students instead travel to multiple public libraries a day or work in McDonald's for free Wi-Fi. Many of these unconnected students also lack computers on which to do their work, instead typing papers or college application essays on their mobile devices.

Disproportionately, the students returning to unconnected homes are from low-income households, particularly black and Hispanic households.[5] FCC Commissioner Jessica Rosenworcel wrote in June 2015 that 70 percent of teachers assign homework that

[3] "FAQs: Category Two Budgets," *Universal Service Administrative Company*. http://www.usac.org/sl/about/faqs/faqs-Category-Two-Budgets.aspx

[4] Pew Research Center, "Households with School-Aged Children that Do Not Have Broadband Access," http://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap/.

[5] Ibid.

requires Internet access while one in three households does not have Internet at home – this discrepancy, she wrote, is the "Homework Gap."[6]

The Homework Gap is an illustrative moniker for a problem more aptly named the "at-home Internet connectivity gap." Home Internet connectivity is a vital resource necessary for students to accomplish 21st century learning objectives. At-home Internet connectivity is proven to foster better educational outcomes. Students are seven percent more likely to earn a high school diploma and seven percent more likely to graduate college when connected to the Internet at home.[7] People who receive a high school diploma will earn $1 million more over a lifetime compared to those without. The same is true for those who graduate college relative to those who do not.[8]

Homework done at home is "integral, immediate, and proximate to the education of students," fulfilling the Commission's definition of an "educational purpose" for broadband use.[9] The educational mission of E-rate cannot be fulfilled if only applied within schools. Education continues outside of the school walls and beyond the school day.

Fulfilling the Educational Mission of the E-Rate Program

Expanding E-rate supported connectivity to the surrounding community is imperative to fulfil the educational mission of the E-rate program.

As the government's largest educational technology program, E-rate was established to bring affordable broadband service to qualified schools and libraries, thus connecting students to the Internet for educational purposes.[10] In 2015, E-rate funding expanded Wi-Fi to 10 million students, and now, the FCC reports that "virtually all" schools and libraries are connected to the Internet.[11] Recognizing that digital resources are essential for educational attainment, the government's Universal Service Fund allocation to E-rate connectivity has greatly furthered its goal of connecting students.

---

[6] Jessica Rosenworcel, "Bridging the Homework Gap," *Huffpost Education*, 15 June 2015. http://transition.fcc.gov/files/documents/Bridging-the-Homework-Gap-Rosenworcel-Editorial.pdf

[7] Daniel Beltran, Kuntal Das, and Robert Fairlie, "Home Computers and Educational Outcomes: Evidence from the NLSY97 and CPS," *International Finance Discussion Papers*, Federal Reserve System, no. 958 (2008). http://www.federalreserve.gov/pubs/ifdp/2008/958/ifdp958.pdf

[8] Anthony P. Carnevale, Stephen J. Rose and Ban Cheah, "The College Payoff: Education, Occupations, Lifetime Earnings," The Georgetown Center on Education and the Workforce. $1M is the difference between $2.3M (college earnings) and $1.3M (high school earnings). https://www2.ed.gov/policy/highered/reg/hearulemaking/2011/collegepayoff.pdf

[9] Federal Communications Commission, "Wireline Competition Bureau Seeks Comment on Petitions Regarding Off-Campus Use of Existing E-rate Supported Connectivity," Public Notice, DA 16-1051. http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0919/DA-16-1051A1.pdf?mc_cid=90df2996b7&mc_eid=90e82e1935, page 1.

[10] "Universal Service Program for Schools and Libraries (E-Rate)," *Federal Communications Commission,* 13 January 2015. https://www.fcc.gov/general/universal-service-program-schools-and-libraries-e-rate

[11] Ibid.

Why should this connectivity for educational achievement stop at the school door?

The educational mission of the E-rate program is to connect students, but connecting students in the classroom only connects them for seven hours of the day. Once at home, unconnected students face the aforementioned Homework Gap, encountering structural barriers to academic success when they cannot complete the school work necessary to earn good grades. This gap is one that simply should not exist. This series of barriers aggregates disadvantage and impedes educational attainment. Beyond homework completion, students face challenges in gaining access to resources for preparing for secondary education. Students cannot access free resources like BigFuture from The College Board, Khan Academy instructional videos, nor the Common App for applying to college. When K-12 students are educated, both fundamentally and in digital literacy, parents are educated, too, and are presented with opportunities for social mobility.

Previously, classroom connectivity presented the largest barrier to educational technology use; due in part to the effective work of the E-rate program in its modernized instantiation, this barrier has since shifted to at-home connectivity. Education goes beyond the classroom.

We believe that schools can have a significant impact on their community as an anchor institution if allowed to use their TV White Space to broadcast Super Wi-Fi to surrounding buildings. This move would further promote schools as a public resource and foster opportunities for collaboration with neighboring community-based organizations or anchor institutions, such as public housing structures, local businesses, Boys and Girls Clubs, and more.

Remaining true to the mission and intent of the program, the E-rate funding should pivot and TVWS technology expand to address today's educational technology barrier: at home-connectivity.

Accelerating the Closure of the Digital Divide
Expanding E-rate service to surrounding communities adds a federally supported tool to the toolbox of digital inclusion, making it easier to reach the 64 million people in America who remain unconnected.

EveryoneOn supports reforms that make it easier for folks to obtain the life-changing power of the Internet in their homes. Increasing the number of federally supported at-home connections by expanding E-rate service to surrounding communities will help close the digital divide by facilitating broadband adoption.

These petitions seek to allow extended use of E-rate connectivity under current and unextended budgets. Allowing for the expansion of E-rate service to surrounding communities without requiring the providing schools to cost allocate out this 'ineligible' service would remove a barrier that is regulatory. It is the budgetary accounting that must

change – not the budget – to allow the bandwidth protected for educational use to continue to serve educational purposes in the home.

In extending E-rate service beyond campus grounds, schools and libraries can further serve as anchor institutions, standing with the federal government's support as pillars of digital inclusion for their communities. These anchor institutions desire to play this role: EveryoneOn has been approached by schools on the subject of spending these dollars on at-home connectivity. Many schools find that they've exhausted the work they can do within the bounds of E-rate designation, but still have many dollars left in this restricted pot designated for connectivity work. The cause of closing the digital divide would benefit greatly from decreasing the restrictions on this funding to allow for support of at-home connectivity.

Conclusion

EveryoneOn supports the expansion of off-campus, at-home connectivity for students. In service of this broader goal, EveryoneOn calls for 1) the extension of existing E-rate supported connectivity without requiring cost allocation and 2) permissible utilization of TV White Space to broadcast Wi-Fi to the surrounding area.

To achieve greater at-home connectivity for students through expanded E-rate and TV White Space service, EveryoneOn advocates for:

- **General broadening of current E-rate service eligibility**
- **Relaxing current E-rate constraints on TV White Space (TVWS) use**
- **Codify by rule these expansions to facilitate students' at-home connectivity**

Expanding E-rate supported connectivity to the surrounding community:
1) helps close the Homework Gap,
2) furthers the educational mission of the E-rate program, and
3) furthers interested parties' goal of closing the digital divide, with schools as key anchor institutions in providing broadband.

Expanding E-rate fulfills the educational mission of the program. Schools will continue to allocate E-rate resources to in-school connectivity. Nationally, we will achieve full in-school connectivity by 2020, but education does not end at the school gates. At-home connectivity for educational use fulfills the core calling of the E-rate program. Schools welcome the opportunity to reallocate unused E-rate funding and resources to support at-home connectivity, which would help close the Homework Gap for their students and further their educational attainment. EveryoneOn applauds Chairman Wheeler's leadership in creating the conditions for greater Internet connectivity across the country, especially at home. At EveryoneOn, we know firsthand the power of Internet access and devastation for those caught on the wrong side of the digital divide.

****

About EveryoneOn

EveryoneOn is a national nonprofit working to eliminate the digital divide by making high-speed, low-cost Internet service and computers, as well as free digital literacy training, accessible to all unconnected people in the United States. Since 2012, we have connected more than 350,000 low-income people in 48 states. We aim to leverage the democratizing power of the Internet to provide opportunity to all people in America—using connectivity to create social mobility for all.

Our organization has been able to attain national scale while maintaining impact on a community level due to our three-part approach: 1) working with Internet service providers to create and deploy low-cost offers; 2) creating a best-in-class digital platform, which is best described as a "TurboTax for digital inclusion" that families can use to access affordable Internet service, devices, and digital literacy education; 3) and maintaining a nationwide network of partners across sectors who are driving adoptions on-the-ground directly in communities. No other organization has brought together such a collection of assets to bridge the digital divide.

Serving as an intermediary facilitator between low-income households and Internet service providers, device refurbishers, digital literacy trainers, and more, we also work with enrollment partners (nonprofits, schools, and other community-based organizations) across the country to better reach eligible populations. Additionally, we help organizations by subsidizing service and devices for their beneficiaries. Through our digital platform, partner platforms, and relationships with Internet service providers and device refurbishers, we are able to market these offers and collect data in order to help people adopt the Internet and end the digital divide once and for all.

Respectfully submitted,

Chike Aguh
CEO, EveryoneOn
chike@everyoneon.org